

Indian Point 3
Nuclear Power Plant
P.O. Box 215
Buchanan, New York 10511
914 736.8001



L. M. Hill
Resident Manager

June 10, 1995
IPN-95-064

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

SUBJECT: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
License No. DPR-64
Reply to Notice of Violation 50-286/95-04

Dear Sir:

This letter provides (in Attachment I) the Authority's response to the subject Notice of Violation. The Authority agrees with the Notice of Violation (contained in NRC Region I Inspection Report 50-286/95-04).

As noted in the attached reply, we agree with the NRC that we did not sufficiently proceduralize or evaluate cross connecting DC Power Panels 33 and 34. The Authority recognizes that improving the station's questioning attitude and attention to detail remains among our highest priorities. A human performance enhancement program has been developed and implemented. This program defines the expectations and accountabilities for both plant management and staff. This program also provides the mechanisms necessary for monitoring program effectiveness and for ensuring timely intervention and corrective action.

The Authority is making three new commitments in Attachment II.

Very truly yours,


L. M. Hill
Resident Manager
Indian Point 3 Nuclear Power Plant

Attachments

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PDR ADOCK 05000286
Q PDR

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cc: Mr. Curtis Cowgill
Project Branch No. 1
Division of Reactor Projects
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, Pennsylvania 19406-1415

Mr. Thomas T. Martin
Regional Administrator
Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, Pennsylvania 19406-1415

U.S. Nuclear Regulatory Commission
Resident Inspectors' Office
Indian Point 3 Nuclear Power Plant

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Violation

During an NRC inspection conducted on March 28, to April 17, 1995, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

10 CFR Part 50, Appendix B, Criterion V, requires that activities affecting quality be prescribed by documented instructions, procedures or drawings of the type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures or drawings.

Contrary to the above, on March 15, 1995, the 125 volt direct current Power Panels 33 and 34 were cross tied without being prescribed or accomplished in accordance with documented instructions, procedures, or drawings of the type appropriate to the circumstances. As a result, the 34 battery was supplying loads to two direct current panels, instead of one direct current panel. This line-up was not previously evaluated to determine its ability to support emergency diesel generator operability. Additionally, the battery was operated in a manner inconsistent with license documents.

This is a Severity Level IV violation. (Supplement I)

Response To The Violation (VIO 95-04-02)

The Authority agrees with this violation.

Reason For The Violation

The event that resulted in cross connecting 33 and 34 DC Power Panels was discovered during performance of surveillance test 3PT-W13. Cell number 60 on 33 Station Battery was found to be leaking electrolyte. Replacement of the cell was deemed necessary; therefore, 33 Station Battery was removed from service and 34 Station Battery was cross tied in order to provide power to the 33 DC distribution system and its normal 34 DC distribution system. This evolution was not clearly delineated in a procedure nor was an evaluation of this configuration performed.

The reason for this violation is that a mindset existed in that cross connecting of DC Power Panels (which is possible using installed bus tie breakers) during cold shutdown was acceptable and considered a routine maintenance and testing activity. Also contributing to this event were the following:

- IP3 documents such as the FSAR and Design Basis Documents did not specifically address the use of tie breakers in cold shutdown with regards to

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independence criteria (i.e. single failure criteria, cross channelization, separation of channels, redundancy).

- There was a failure to recognize the need to have a specific evaluation/procedure that could provide adequate guidance prior to using the tie breaker.
- A questioning attitude was not employed with respect to past practices being acceptable.
- Generic Letter 91-11 dated July 18, 1991, addressed "interlocks and LCO's for class IE Tie Breakers." This letter discusses the use of tie breakers when the plant is not in operation as a means of permitting convenient maintenance of supply buses and equipment without de-energizing plant equipment. The Authority's response concluded DC tie breaker limiting conditions of operation were not necessary, since operation with the DC tie breakers closed was prohibited above cold shutdown. (Reference NYPA letter IPN-92-007 dated February 3, 1992)

Subsequent to this event, 33 Battery was replaced in its entirety, returned to service, and the tie breakers opened. The plant was taken above the cold shutdown mode. Closure of the DC Power Panel tie breakers above cold shutdown is prohibited in checkoff list EL-3 which is required to be performed before exiting cold shutdown in accordance with Plant Operating Procedure 1.1.

Corrective Actions Taken

The tie breakers were opened on April 10, 1995, prior to exceeding cold shutdown.

A shift order and standing order were issued to the operations staff prohibiting use of the D.C. Power Panel tie breakers unless an evaluation is performed and procedures are in place.

Corrective Actions That Will Be Taken To Avoid Further Violations

An evaluation will be performed which will either permit or prohibit use of cross tie breakers for DC Power Panels 31 through 34 for the various modes of operation. Based on the outcome of this evaluation, the appropriate documents/procedures will be revised or written.

This event, including this reply and Notice of Violation, will be "required reading" for the Operations Department personnel to re-emphasize the need for an aggressive questioning attitude.

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The Date When Full Compliance Was Achieved

Full compliance with the configuration of one battery supplying one DC Power Panel was achieved on April 10, 1995 in that the tie breakers between DC Power Panels 33 and 34 were opened on that date.

The Date When Corrective Actions Will Be Completed

Engineering will perform an evaluation of DC tie breaker use by August 30, 1995. Engineering will also recommend any required changes to documents such as the FSAR, DBDs, etc.

This response and Notice of Violation will be included as "required reading" for the Operations Department personnel and read prior to reactor criticality.

The Operations Department will implement the necessary procedural requirements resulting from Engineering's analysis by September 26, 1995.

List of Commitments

Number	Commitment	Due
IPN-95-064-01	Engineering will perform an evaluation of DC tie breaker use by August 30, 1995. Engineering will also recommend any required changes to documents such as the FSAR, DBDs, etc.	August 30, 1995
IPN-95-064-02	This response and Notice of Violation will be included as "required reading" for the Operations staff and read prior to reactor criticality.	Prior to reactor criticality
IPN-95-064-03	Operations will implement the necessary procedural requirements resulting from Engineering's analysis.	September 26, 1995